

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND**

IN RE:

SHARON ELAINE BLAKE

Debtor

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CASE NO.: 14-29488

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RESPONSE TO ORDER TO SHOW CAUSE

Sharon Elaine Blake, by and through her counsel, Natasha V. Rossbach, files this
Response to Order to Show Cause and in support thereof states as follows:

1. That on December 27, 2014, the Debtor, through counsel, filed a Petition Chapter 13 for Bankruptcy Relief.
2. That the debtor was involved in a previous Chapter 13 Bankruptcy that was filed on or about March 21, 2014 and assigned a case number of 14-14468. Said previous case was dismissed for failure to file a Plan, ultimately because Debtor was still unemployed and feasibility was an issue.
3. That Counsel filed a Motion to Extend the Automatic Case in the present case on December 29, 2014.
4. That this Honorable Court issued an Order and Notice of a Hearing on Motion to Extend the Automatic Stay on December 30, 2014.
5. That counsel mistakenly believed that a Hearing was not set on the Motion.
6. That counsel's husband lost his job and counsel has had to take on additional legal contract work, outside of her law practice, to provide for counsel's family.
7. That counsel's assistant, who helped counsel manage counsel's calendar, resigned in

early November.

8. That counsel is extremely apologetic for missing the ECF notification of the Order setting a hearing on Counsel's Motion.
9. That counsel assures this Honorable Court that no such event will occur again, as counsel is researching a system where all of counsel'd hearings and deadlines are automatically entered on the calendar.

WHEREFORE, the Debtor respectfully requests that this Honorable Court:

- A. Dissolve the Show Cause Order; and
- B. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

/s/ Natasha V. Rossbach

Natasha V. Rossbach, Esquire
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(410)788-8208
Bar No.: 26977

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of January, 2015, a true copy of the foregoing Response to Order to Show Cause was forwarded electronically or via first class mail to all interested individuals and/or entities.

/s/ Natasha V. Rossbach

Natasha V. Rossbach, Esquire